

# Exhibit 13

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UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

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AARON JAMES and TIFFANY JAMES,  
Heirs and Proposed Personal Representatives  
of the Estate of Zane James,

Plaintiffs,

vs.

CASEY DAVIES, and COTTONWOOD  
HEIGHTS;

Defendants.

**DECLARATION OF PAULA MELGAR**

Case No. 2:19CV341 HCN DBP

Judge Howard C. Nielson, Jr.  
Magistrate Judge Dustin B. Pead

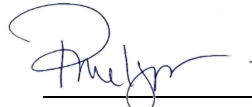
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PAULA MELGAR declares as follows:

1. I am over the age of eighteen and have personal knowledge of the following.
2. I have been the Cottonwood Heights City Recorder since 2016 and, in that capacity, also am the city's records officer for purposes of the Government Records Access and Management Act, Utah Code Ann. 63G-2-101 et seq.
3. I have not seen nor had in my possession as the city's records officer any video footage (body camera, dash camera, etc.) of the actual shooting of Zane James (as opposed to video footage following the shooting, including post-shooting response).
4. I did not speak to Tiffany James on August 4, 2020. In fact, I do not recall ever having spoken with Tiffany James.
5. I have never told Ms. James that Cottonwood Heights has or had video footage of the actual shooting of Zane James. I am not aware of any such footage and do *not* believe such footage exists.

I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

DATED this 13<sup>th</sup> day of August, 2020, in Salt Lake County, Utah.

A handwritten signature in blue ink, appearing to read "Paula Melgar", is written over a horizontal line.

Paula Melgar